

EXHIBIT A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

B.E. TECHNOLOGY, L.L.C.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

**Civil Action No. 12-cv-02830
Hon. John Phipps McCalla**

**DECLARATION OF ABEER DUBEY IN SUPPORT OF DEFENDANT'S MOTION
TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, Abeer Dubey, hereby declare:

1. I am a People Analytics Manager at Defendant Google Inc. I submit this declaration based upon my personal knowledge and corporate records maintained by Google in the ordinary course of business. If called upon to testify, I could and would competently testify thereto.

2. Google has been headquartered in Northern California since its founding in 1998. Google is presently headquartered in Mountain View, California.

3. I understand that Plaintiff B.E. Technology, L.L.C. has identified the following as accused products and services: "a method of providing demographically targeted advertising" and "tablet computer products [i]nclud[ing] Google Nexus products."

4. Based upon my understanding of what products and services have been accused of infringement in this case, the individuals at Google likely to have knowledge of the accused products and services are all located in Northern California. To the extent any such individuals may be located outside Mountain View, California, they would report to Google's headquarters

in Mountain View, California. Google employees most knowledgeable of the design, development and operation of, and the financial information regarding these products and services are located in Mountain View, California.

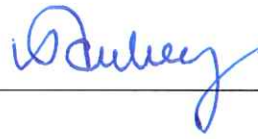
5. Google's Mountain View, California location is the strategic center of Google's business. Decisions related to Google's overall business are made in Mountain View, California, including most significantly sales, marketing, and engineering decisions regarding Google's products and services, and in particular, the accused products and services.

6. Google does not have any offices or facilities in the Western District of Tennessee. I am not aware of the existence of any documents related to the accused products or services that are located in the Western District of Tennessee. Specifically, I am not aware of any Google employees working in the Western District of Tennessee with relevant knowledge regarding the accused products or services or any other aspect of the subject matter of this litigation.

7. I am also not aware of any development or management of any of the accused products or services occurring in the Western District of Tennessee. None of the employees involved in product development or management of the accused products or services work in the Western District of Tennessee.

8. All, or nearly all, of the documents and highly proprietary information and source code relating to the accused products and services are stored in Google's data centers that are ultimately managed from Mountain View, California. The same is true for all or nearly all of the information related to the general operations, marketing, financials, and customer service information for Google.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Mountain View, California on this 10th of December 2012.



A handwritten signature in blue ink, appearing to read "Dulley", is written over a horizontal line.